

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In Re:

Charles Martin

Debtor.

Case Number: 20-18680-MCR
Chapter 7

2024-05-06 FILED
BANKRUPTCY COURT
MAY 24 PM 1:11

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**DEBTOR'S MOTION TO CONTINUE THE HEARING SCHEDULED FOR MAY 8, 2024
AND MOTION FOR APPROPRIATE RELIEF**

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COMES NOW, Charles Martin, Debtor, in the above captioned bankruptcy estate (hereinafter the "Estate"), temporarily Pro Se, who files this **Motion to Continue and Motion for Appropriate Relief** on the Trustee's Motion to Sell Real Property Located at 3910 Hayward Ave., Baltimore, MD 21215, and respectfully states to this Court as follows:

MOTION TO CONTINUE

1. The Trustee has moved to schedule a hearing on May 8, 2024 at 2:00pm.
2. The Debtor has filed a Response and Opposition on this 2nd day of May, 2024.
3. The Debtor files this Motion to Continue for two reasons:
 - a. The Debtor will not be able to attend the hearing and said date and time; and,
 - b. The Debtor may have a manner and means to properly and orderly dispose of this instant case, but has not yet resolved all of the key components to provide a demonstrative plan to this Court to accomplish the same.
4. While the Debtor has a membership interest in the stated limited liability company, **proper service has not been affected** upon the entity.
5. The Debtor has not seen where proper service has been affected upon the lienholders and creditors.

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6. Given the fact that the parties have not been properly served, it is more than appropriate for this Court to grant the relief prayed by the Debtor.
7. Given the fact that the consideration suggested by the Trustee is insufficient to resolve the debts in question, it is more than appropriate for this Court to grant the relief prayed by the Debtor.
8. Given the fact that the Debtor has opposed the Trustee's Motion, it is more than appropriate for this Court to grant the relief prayed by the Debtor.

MOTION FOR APPROPRIATE RELIEF

9. The Debtor incorporates paragraph 1 - 8 by reference as if fully stated herein.
10. The Debtor has determined that if he has any chance of being super successful in this case, he needs super competent legal counsel to aid him in the same.
11. The Debtor admits that this case has been pending for some time and has not been smooth.
12. While being respectful and not laying blame upon anyone, the Debtor states that there have been a number of superfluous actions which have complicated this case.
13. The Debtor does see a way forward and asks this Court for a continuance while he secures all of the appropriate resources which are needed to advance this case in a manner that this Court will appreciate and will ultimately allow the Debtor to be super successful.
14. The Debtor also states that his plan to move this case forward is in the best interest of his Estate and the creditors associated with the same.

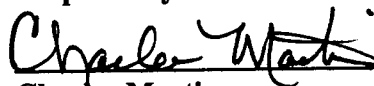
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15. The Debtor acknowledges that the path forward will be hard, but the Debtor is committed to seeing this process through, and prays that he gains the support of the Court, those who work for the Court, and those who are at this Court's discretion.
16. A continuance will not prejudice the Trustee or any other party.
17. A continuance will provide an opportunity for this case to get back on track and get resolved properly and orderly.
18. Given the fact that the Debtor may now have a way to resolve this instant case properly and orderly, it is more than appropriate for this Court to grant the relief prayed by the Debtor.

WHEREFORE, Charles Martin, Debtor in the above captioned matter prays the following of this Court:

1. That this Court enters an ORDER which cancels the May 8, 2024 hearing and resets the hearing date for Wednesday, June 5, 2024 at 2:00pm.
2. Grant any other and further relief that this Court deems just, fair, proper, in the interest of justice, and in the interest of the Debtor's reorganization.

Respectfully Submitted:



Charles Martin
5803 Lowery Lane
Upper Marlboro, MD 20772

May 2, 2024


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **2nd day of May, 2024**, that the following parties were served via this Court's CM/ECF system electronically on the the following:

1. Glenna E. Barner
2. Leah Christina Freedman
3. Marie Louise Hagen
4. Keith R. Havens
5. James M. Hoffman
6. Nicole C. Kenworthy
7. Lynn A. Kohen
8. Darren Michael Margolis
9. Shannon Jacob Posner
10. L. Jeanette Rice
11. Cheryl E. Rose
12. Roger Charles Simmons
13. William Scott Tinney
14. U. S. Trustee - Greenbelt
15. Maurice Belmont VerStandig
16. Brett Weiss

Respectfully Served:


Charles Martin
5803 Lowery Lane
Upper Marlboro, MD 20772

May 2, 2024